

Compliance with SB 14

The Hazardous Waste Source
Reduction and Management
Review Act of 1989 (SB 14)



Today's Agenda



- ◆ Are you captured under SB 14?
- ◆ The Plan
- ◆ The Performance Report
- ◆ The Summary Progress Report
- ◆ Document review

What is source reduction?

- ◆ Source Reduction = Pollution Prevention
The act of preventing waste at its source...before generation.
- ◆ Source reduction is not:
 - Recycling
 - Treatment
 - Transfer to another environmental medium
 - Concentration or dilution

Source reduction and SB 14

- ◆ SB14 requires generators to look at their waste-generating processes and identify source reduction opportunities.
- ◆ It encourages businesses to look for ways to make continual improvements
- ◆ Successful source reduction = cost savings
- ◆ Good for business
- ◆ Good for the environment

Compliance with SB 14 means:

1. Completion of a Source Reduction Evaluation Review and Plan (Plan)
2. Completion of a Hazardous Waste Management Performance Report (Performance Report)
3. Completion and submittal of a Summary Progress Report (SPR)

Alternative reporting options for small businesses

Generator Requirements

- ◆ All generators subject to SB 14 in 2002 must prepare a Plan, Performance Report and SPR by **September 1, 2003.**
- ◆ Plan and Performance Report must be kept on site and made available upon request by an agency or the public.
- ◆ Only the SPR must be submitted to DTSC by September 1, 2003.
- ◆ DTSC may ask a generator to send in their SB 14 documents.

Confidentiality

- ◆ Generator may claim some information as trade secret or confidential.
- ◆ Generator must mark “confidential” on each page containing confidential information.
- ◆ Agency inspectors can review this info.
- ◆ When agency requests SB 14 document containing confidential information, generator must submit two versions of document:
 - One containing confidential information properly marked.
 - The other without the confidential information that indicates which pages have been removed.

Resources

- ◆ DTSC's 2002 SB 14 Guidance Documents and other OPPTD publications
 - To order, call (916) 322-3670
 - Or download:
www.dtsc.ca.gov/PollutionPrevention/index
- ◆ Technical support: Source Reduction Unit
 - (916) 322-3670
 - E-mail: sb14@dtsc.ca.gov

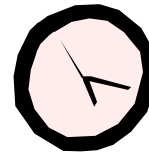
More Resources

- ◆ DTSC Regional P2 Coordinators
 - Nabil Yacoub (714) 484-5389
 - Evelina Rayas (818) 551-2936
- ◆ P2 Resource Exchange – Topic Hubs
www.p2rx.org
- ◆ Western Regional P2 Network-Topic Hubs
www.westp2net.org

Course Materials

- ◆ SB 14 Guidance Manual (Doc. No. 001)
 - Also contains Summary Progress Report
 - and OPPTD Publication List – Appendix E
- ◆ Compliance Checklist (Doc. No. 004)
- ◆ SB 14 document examples
- ◆ Available upon request:
 - Hazardous Waste Minimization Checklist & Assessment Manuals for various industry sectors – see publication list – Appendix E

Are you captured by SB 14?



SB 14 is a Site-Specific Requirement

- ◆ “Site” means the location of an operation that generates hazardous waste.
- ◆ If two operations are contiguous and owned by the same person (i.e., generator) the operations are considered one “site.”
- ◆ If two locations owned by the same person are not touching, they are two sites.

See Section 25205.1(h) of the California Health and Safety Code for definition of “site.”

SB 14 Applicability Thresholds

- ◆ SB 14 applies to generators who *routinely generate* >12,000 kg haz waste or >12 kg extremely hazardous waste during a *reporting year*

12,000 kg = 26,400 lbs

= 13.2 tons

= 3,165 gallons

12 kg = 26.4 lbs = 3.2 gallons

See Chapter 2 of your Guidance Manual

Reporting Year = 2002

- ◆ SB 14 requires reporting on a 4-year cycle
- ◆ Hazardous waste generation data from **calendar year 2002** (the reporting year) is used to determine SB14 applicability.
- ◆ Use reporting year data as the basis for the source reduction evaluation.
- ◆ Data from the reporting year is the basis for your SB 14 documents due on or before September 1, 2003

Determine applicability for Reporting Year 2002

- ◆ Conduct inventory of wastes stored on site
 - Review hazardous waste manifest records
 - Review shipping records and weight tickets
 - Inspect storage areas
- ◆ List all hazardous wastes generated in 2002 including CWC and total weight or volume
 - Include any liquid or solid hazardous wastes that are pretreated on site
 - Include wastes that are recycled, treated or disposed off site

Quantify all wastes prior to treatment or recycling

Example

Hazardous Waste	CWC	Amount Generated - 2002
Rinse water	132	85,600 gallons
Plating bath	792	1,000 gallons
Filter cake	171	890 pounds
Paint waste	331	10,000 pounds
Solvent	214	1,500 pounds
Waste oil	221	500 pounds
Drums/containers	513	5,400 pounds
Asbestos waste	151	200 pounds
Contaminated Rags	551	500 pounds

SB 14 applies only to routinely generated waste streams

- ◆ From ongoing processes and operations
- ◆ From regularly scheduled maintenance
- ◆ Includes hazardous wastes treated on site AND hazardous wastes recycled, treated or disposed off site.
- ◆ Focus on point of generation.

Cross non-routine wastes off your list.

SB 14 does not apply to exempted waste streams

- ◆ motor vehicle fluids
 - ◆ household haz waste
 - ◆ asbestos
 - ◆ PCBs
 - ◆ emergency response
 - ◆ lab-scale research waste
- lead acid batteries
 - site cleanup waste
 - medical waste
 - spent ordinance
 - demolition waste

Complete list GM pg. 17 and 22 CCR 67100.2

Cross exempted waste streams off your list

SB 14 does not apply to Universal Waste

- ◆ Universal wastes must be managed according to universal waste regulations – 22 CCR 66273
- ◆ Universal wastes include:
 - Batteries
 - Thermostats (mercury-containing)
 - Electric Lamps (fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps)
 - Cathode ray tubes (TV screens and monitors)

Don't double count

- ◆ If you pre-treat hazardous waste on site, then discharge this waste to the sewer, do not include treatment residuals (secondary wastes) on your list.
- ◆ Only count treatment residuals if:
 - they are derived from treatment of a nonhazardous waste stream, OR
 - the treated water is not discharged to the sewer.

Excluded recyclable materials

- ◆ Some recyclable material are excluded from classification as a waste *provided* the conditions in Health and Safety Code Section 25143.2 are met.
- ◆ Such materials would not be included in your SB 14 total.
- ◆ Questions: Contact DTSC's Waste Classification Unit (916) 327-4499

Are you captured?

- ◆ Exclude nonroutine, exempt, and secondary wastes
- ◆ Convert remaining waste streams to common units (lbs, Kg, tons)
- ◆ Add remaining waste streams and compare total to SB14 threshold
 - 12,000 kg, 26,400 lbs, 13.2 tons
- ◆ Captured if waste generated in 2002 exceeds the threshold.

Remember, this is all in Guidance Manual Chapter 2

Haz.Waste	CWC	2002 Qty	Pounds	Routine?	Exempt?
Rinse water	132	85,600 gal	713,900	Yes	No
Plating bath	792	1,000 gal	8,340	Yes	No
Filter cake	171	890 lbs	890	Yes	No
Paint waste	331	10,000 lbs	10,000	Yes	No
Solvent	214	1,500 lbs	1,500	Yes	No
Waste oil	221	500 lbs	600	Yes	Yes
Drums/ containers	513	5,400 lbs	5,400	Yes	No
Asbestos waste	151	250 lbs	250	No	Yes
Rags	551	500 lbs	500	Yes	No
Total			739,640		

Extremely Hazardous Wastes

- ◆ If you generate extremely hazardous wastes, prepare a separate list and compare the total to the 26.4 lb threshold.
- ◆ Defined in California Health & Safety Code Section 25115
- ◆ Also see California Code of Regulations, Title 22 Sections 66261.107 - .113

Federal Facility Requirements

- ◆ Federal facilities are currently subject to SB14.
- ◆ In the past, federal facilities have met SB 14 requirements in their annual waste minimization plans required under Federal law.
- ◆ Questions? Contact Dan Garza at DTSC's Office of Pollution Prevention
(916) 322-5798

Off-site hazardous wastes

- ◆ Hazardous wastes or residuals derived from wastes brought from off-site sources are excluded from the definition of “generated waste” [HSC 25200.3(c)(8)]
- ◆ Hazardous waste generated at a TSDF should be evaluated for SB14 applicability.

Compliance with SB 14 means...

1. Conduct source reduction evaluation
2. Complete a Source Reduction Evaluation Review and Plan (Plan)
 - Checklist alternative for small businesses
3. Complete a Hazardous Waste Management Performance Report (Performance Report)
 - USEPA biennial gen report for small businesses
4. Complete and submit a Summary Progress Report (SPR) – no SB 14 alternative

2003 SB 14 Reporting Timeframes

Period covered in Summary Progress Report (SPR)

ACCOMPLISHMENTS

PROJECTIONS

Period covered in
Performance Report

Period covered in
Source Reduction Plan



September 1, 2003
SR Plan and Performance Report completed
SPR completed and submitted

Questions

- ◆ Does the generator own multiple sites with similar processes, operations, and waste streams?
 - All sites may be addressed in a multi-site Plan, Performance Report, and SPR
- ◆ Is generator new to SB14 as of 2002?
 - Must still prepare all three SB 14 documents
 - Generator may choose baseline year other than 1998 – a year with complete and representative data – baseline year may equal reporting year

What next?

- ◆ Captured by SB 14?
 - Initiate source reduction evaluation
- ◆ Not captured by SB 14?
 - Could still benefit from source reduction
 - Cost savings due to improved efficiency and decreased hazardous waste disposal
 - Improve worker health and safety (and morale)
 - Improve compliance status
- ◆ Continuous improvement is good for business

What if you are out of compliance?

- ◆ Enforcement for Class II violations
 - Inspector will issue a notice of noncompliance
 - Generator must correct deficiencies and submit revised documents within 60 days of notice
 - CUPA may impose civil penalties up to \$1000/day for failure to submit within the required period
- ◆ Let OPPTD help you return to compliance

Questions?



Call or e-mail OPPTD,
Source Reduction Unit

- ◆ (916) 322-3670
- ◆ sb14@dtsc.ca.gov